

From: Traversi, Richard@CDCR [mailto:Richard.Traversi@cdcr.ca.gov]
Sent: Wednesday, November 07, 2012 11:57 AM
To: CBSC@DGS
Subject: FW: CDCR comments 45-Day Express Terms DSA CBC

Susan Moe w/ DSA very recently informed me by telephone that the attached comments should be forward to the CA Building Standards Commission as part of the review/comment process for the 2013 CA access code.

Please let me know if this communication is sufficient to relay comments from CDCR for the Express Terms posted on the DSA website or if another method is required.

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CDCR PROPOSED LANGUAGE IN RESPONSE TO
45-DAY EXPRESS TERMS
FOR
PROPOSED BUILDING STANDARDS
OF THE
DIVISION OF THE STATE ARCHITECT (DSA-AC)
REGARDING THE CALIFORNIA BUILDING CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2
2013 CALIFORNIA BUILDING CODE

11B-206.2.8 Employee Work Areas. Common use circulation paths within employee work areas shall comply with 11B-402.

EXCEPTIONS: 1. ~~Reserved.~~ **In existing buildings,** common use circulation paths located within employee work areas that are less than 1000 square feet (93 m²) and defined by permanently installed partitions, counters, casework, or furnishings shall not be required to comply with 402.

Justification: In many CDCR facilities this configuration complied with code in force at time of construction, but if there are alterations in these areas there is insufficient space to meet this current requirement.

11B-306.3 Knee Clearance.

11B-306.3.1 General. Space under an element between 9 inches (230 229 mm) and 27 inches (685 686 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 11B-306.3.

EXCEPTION: *At lavatories required to be accessible by 11B-212.3, space between 9 inches (229 mm) and 29 inches (737 mm) above the finish floor or ground under, shall be considered knee clearance.*

11B-306.3.2 Maximum Depth. Knee clearance shall extend 25 inches (635 mm) maximum under an element at 9 inches (230 229 mm) above the finish floor or ground.

EXCEPTION: *Knee clearance shall extend 19 inches (483 mm) maximum under lavatories required to be accessible by 11B-212.3.*

11B-306.3.3 Minimum Required Depth. Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches (280 279 mm) deep minimum at 9 inches (230 229 mm) above the finish floor or ground, and 8 inches (205 203 mm) deep minimum at 27 inches (685 686 mm) above the finish floor or ground.

EXCEPTIONS: 1. *At lavatories required to be accessible by 11B-212.3, the knee clearance shall be 27 inches (686 mm) high minimum above the finish floor or ground at a depth of 8 inches (203 mm) minimum increasing to 29 inches (737 mm) high minimum above the finish floor or ground at the front edge of a counter with a built-in lavatory or at the front edge of a wall-mounted lavatory fixture.*

At lavatories required to be accessible by 11B-212.3, the knee clearance shall be 29 inches (686 mm) high minimum above the finish floor or ground at the front bottom edge of the lavatory reducing to 27 inches (686 mm) above the finish floor or ground at a minimum depth of 8 inches (203 mm).

2. *Reserved* ~~*At sinks required to be accessible by 11B-212.3, knee clearance shall extend 19 inches (483 mm) deep minimum at 27 inches (685-686 mm) above the finish floor or ground.*~~

3. *At built-in dining and work surfaces required to be accessible by 11B-226.1, knee clearance shall extend 19 inches (483 mm) deep minimum at 27 inches (685-686 mm) above the finish floor or ground.*

11B-306.3.4 Clearance Reduction. Between 9 inches (230-229 mm) and 27 inches (685-686 mm) above the finish floor or ground, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for each 6 inches (150-152 mm) in height.

EXCEPTIONS: **1. *Reserved*** ~~*The knee clearance shall not be reduced at sinks required to be accessible by 11B-212.3.*~~

2. *The knee clearance shall not be reduced at built-in dining and work surfaces required to be accessible by 11B-226.1.*

Justification: It is not possible to construct this sink type with code required piping and meet this clear space requirement. There should be a reduction permitted or an exception for the piping to encroach into the required clear space; the piping could be required to be in the center of the sink assembly and with the knees on either side of the piping in that same clear space there would be access. The 2010 ADAS deems the clear space reduction at sinks to provide access for the disabled.

11B-404 Doors, Doorways, and Gates

11B-404.1 General. Doors, doorways, and gates that are part of an accessible route shall comply with 11B-404.

EXCEPTION: Doors, doorways, and gates designed to be operated only by security personnel shall not be required to comply with 11B-404.2.7, 11B-404.2.8, 11B-404.2.9, 11B-404.3.2 and 11B-404.3.4 through 11B-404.3.7. A sign visible from the approach side complying with 11B-703.5 shall be posted stating "Entry restricted and controlled by security personnel" **except at detention and correctional facilities.**

Justification: Within the secure perimeter of a detention or correctional facility, public visitors and inmates are under escort at all times and are given instruction on how to move within the institution and therefore would not require signage. It would not be possible for public visitors or inmates to operate doors controlled by security personnel as they are remote or key operated.

11B-213.2 Toilet Rooms and Bathing Rooms. Where toilet rooms are provided, each toilet room shall comply with 11B-603. Where bathing rooms are provided, each bathing room shall comply with 11B-603.

EXCEPTIONS: **1.** In alterations where it is technically infeasible to comply with 11B-603, altering existing toilet or bathing rooms shall not be required where a single unisex toilet room or bathing room

complying with 11B-213.2.1 is provided and located in the same area and on the same floor as existing inaccessible toilet or bathing rooms.

2. Reserved. Where exceptions for alterations to qualified historic buildings or facilities are permitted by 202.5, no fewer than one toilet room for each sex complying with 603 or one unisex toilet room complying with 213.2.1 shall be provided.

3. Where multiple single user portable toilet or bathing units are clustered at a single location, no more than 5 percent of the toilet units and bathing units at each cluster shall be required to comply with 11B-603. Portable toilet units and bathing units complying with 11B-603 shall be identified by the International Symbol of Accessibility complying with 11B-703.7.2.1.

4. Where multiple single user toilet rooms are clustered at a single location, no more than 50 percent of the single user toilet rooms for each use at each cluster shall be required to comply with 11B-603.

5. In existing detention and correctional facilities, transfer type shower compartments are permitted when roll-in type shower compartments are technically infeasible.

6. In detention and correctional facilities where a building has at least one roll-in type shower compartment, additional accessible shower compartments may be transfer type shower compartments.

11B-608 Shower Compartments

11B-608.1 General. Shower compartments shall comply with 11B-608.

11B-608.2 Size and Clearances for Shower Compartments. Shower compartments shall have sizes and clearances complying with 11B-608.2.

~~11B-608.2.1 Reserved.~~ Transfer Type Shower Compartments as permitted by 11B-213.2 Exceptions 5 & 6. Transfer type shower compartments shall be 36 inches (915 mm) by 36 inches (915 mm) clear inside dimensions measured at the center points of opposing sides and shall have a 36 inch (915 mm) wide minimum entry on the face of the shower compartment. Clearance of 36 inches (915 mm) wide minimum by 48 inches (1220 mm) long minimum measured from the control wall shall be provided.

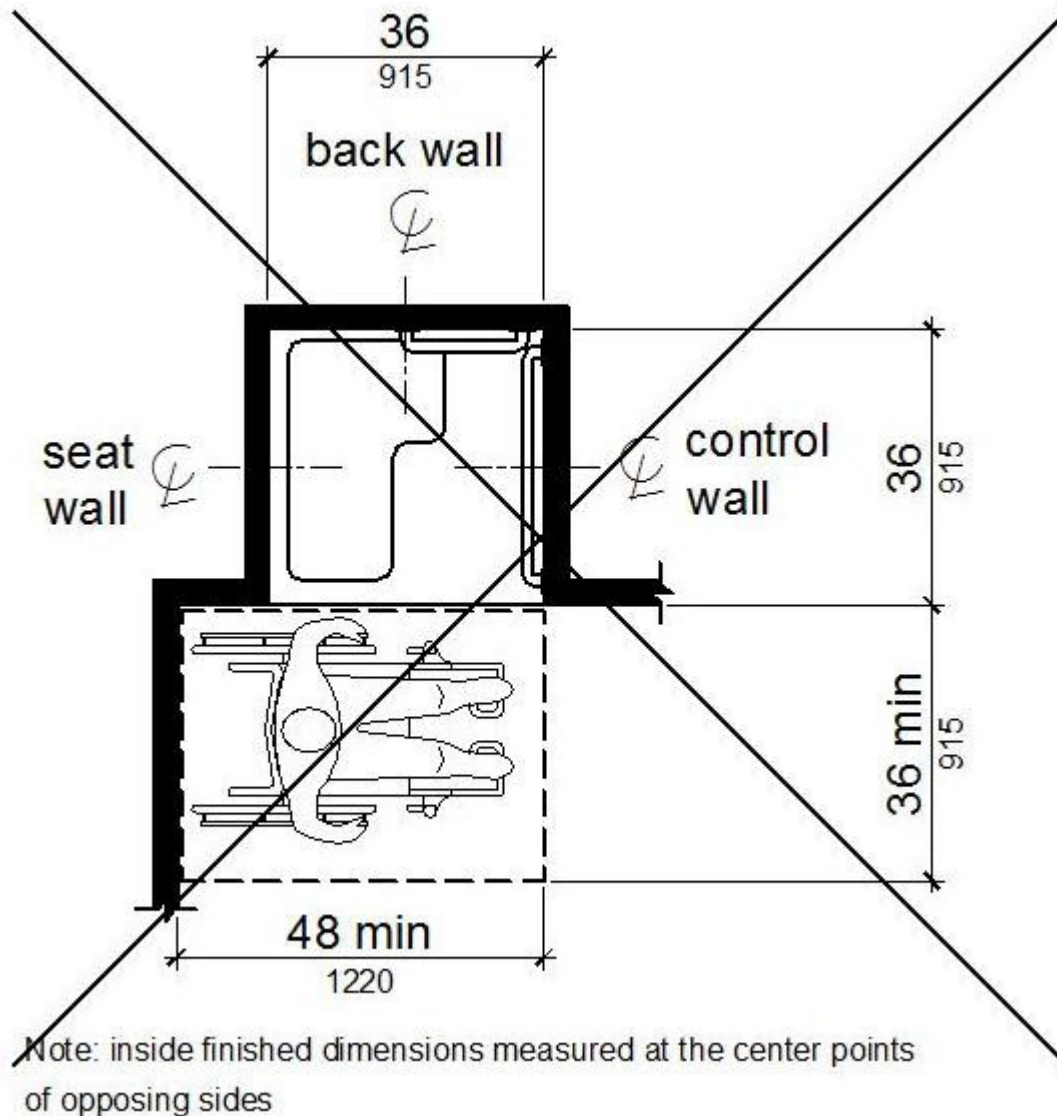


Figure 608.2.1

Transfer Type Shower Compartment Size and Clearance

Justification: Exception 5: detention and correctional facilities are constructed with load-bearing concrete or CMU walls and it is technically infeasible to construct a compliant roll-in type shower compartment in many existing facilities due to location of existing load-bearing walls and lack of available alternate space. Exception 6: providing different types of accessible shower compartments permits inmates with a range of disabilities to have greater access; the roll-in type shower compartment may not provide as much access as a transfer type shower compartment for some disabled individuals. The 2010 ADAS deems the transfer type shower compartment to provide access for the disabled.